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March 27, 2019

**VIA ECF AND HAND DELIVERY**

Hon. Richard M. Berman  
United States District Judge,  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re: United States v. Owens, et al., 18 Cr. 693 (RMB)**

Dear Judge Berman:

Pursuant to the Court's request at the hearing today, we write on behalf of Defendant Harald Joachim von der Goltz regarding the conditions of his pretrial release. At Mr. von der Goltz's initial appearance on Friday, March 22, Judge Aaron accepted Mr. von der Goltz's proposed bail application, to which the government consented, that contemplated that Mr. von der Goltz would reside in Florida during the pendency of this case but would be permitted to travel freely to his home in Massachusetts, as well. *See* Dkt. No. 51. Following the hearing, however, the Pretrial Services Office informed Mr. von der Goltz that, because the bail package includes both location monitoring and a curfew, it would present logistical difficulties for the Pretrial Services Office for Mr. von der Goltz to spend extended periods of time in Massachusetts. As a result, the Pretrial Services Office requested that Mr. von der Goltz choose either the District of Massachusetts or the Southern District of Florida as his primary location, with travel to the alternate district limited to shorter periods of time.

Given this choice, Mr. von der Goltz respectfully requests that the Court alter his bail terms so that he be permitted to have his primary residence in the District of Massachusetts. Mr. von der Goltz is nearly 82 years old and has a history of serious cardiovascular illness, including a double heart attack and heart surgery in the last year. Having spent much of his adult life living in Massachusetts, his primary care physician and heart specialist are located there. Under the circumstances, and given the possibility that he could experience another cardiovascular or other medical issue, Mr. von der Goltz believes it would be safer to have his primary location be in Massachusetts as opposed to Florida.

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We have conferred with the Pretrial Services Office and counsel for the government, and neither takes a position on this request.

Respectfully submitted,

/s/ William A. Burck  
William A. Burck

cc: Officer John Moscato, Pretrial Services Office (via email)  
All counsel of record (via email and ECF)